

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION  
NO. 7:20-CR-167-5M2

UNITED STATES OF AMERICA

v.

JOSEPH MAURINO

**MOTION TO MODIFY TERMS OF  
PRE-TRIAL RELEASE**

NOW COMES the Defendant and moves to modify the terms of pre-trial release as follows:

1. The Defendant, Joseph Maurino, awaits arraignment scheduled for the April 11, 2023 in the Third Superseding Indictment charging him with a conspiracy to manufacture firearms (Count I) and destruction of an energy facility (Count V).
2. Following a detention hearing before this Court in August 2021, the Defendant was released and now resides in New Jersey with his mother and is supervised by the Probation Office of the federal District of New Jersey.
3. The Defendant, upon information and belief, has not violated the terms of his pre-trial release while on pre-trial release.
4. The Defendant requests that he be permitted to travel to his cousin's home for a family celebration of his mother's birthday on April 8, 2023 and celebration of Easter on April 9, 2023.
  - a. On April 8, he asks to be allowed to travel to Café Luna, a restaurant, at 4:30 pm and return home no later than 8:30 pm

- b. On April 9, he asks to be allowed to travel the cousin's home in New Jersey no earlier than 2:00 pm and return to the Defendant's home no later than 10:00 pm.
5. The Defendant will provide the exact addresses of destinations to his supervising probation officer in New Jersey and will remain in the presence of his third-party custodian throughout and refrain from the consumption of intoxicating substances.
6. The Government does not object to the Defendant's requests.

WHEREFORE, the Defendant respectfully moves this Court to temporarily modify the pre-trial conditions as described above.

This the 31st day of March 2023.

/s/ Damon Chetson  
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CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing pleading was served upon opposing counsel by via CM/ECF.

This the 31st day of March 2023.

/s/ Damon Chetson  
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